

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

## 75 Hawthorne Street San Francisco, CA 94105-3901

Mr. Brian Olson Plant General Manager Clean Harbors Environmental Services, Inc. 5756 Alba Street Los Angeles, CA 90058

Re: 2003 Annual PCB Document Log and Follow-Up To October 5, 2004 TSCA Inspection.

Dear Mr. Olson:

As a part of our TSCA PCB inspection at your facility on October 5, 2004, we obtained copies of Clean Harbors' incoming and outgoing PCB waste manifests for the years 2002, 2003 and up to October 2004. In reviewing your 2003 Annual PCB Document Log and related manifests, EPA has identified a number of discrepancies that require resolution. Please respond to the following issues within 30 days:

- The Log indicates 60 Kg of PCB Large Capacitors present at the beginning of the year, none received during the year, none transferred, and none remaining at the end of the year. Please explain what happened to the 60 Kg of PCB Large Capacitors that were present at the beginning of the year.
- The Log indicates 2,210 Kg of PCB transformers on-site at the beginning of the year, 161,679 Kg received, 142,174 Kg transferred, and 19,505 Kg remaining at the end of the year. Please explain what happened to 2,210 Kg of transformers at the site during the year.
- The Log indicates zero PCB Article Containers present at the beginning of the year, 25,741 Kg received, 24,965 Kg transferred, and 2,204 Kg remaining at the end of the year. Please explain the origin of 1,428 Kg of PCB Article Containers remaining at the end of the year.

The Log indicates zero Article Container units at the beginning of the year, 81 received and 599 units transferred. Please explain the origin of the additional 518 Article Containers that were transferred.

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